SOP#: G-009A

Prepared by: Rachel Oda Carteiro   Approved by: Tim Culliton

Title:	***Accessibility Program***

Purpose: To comply with the *Accessibility for Ontarians with Disabilities Act, 2005* and fully integrate individuals with disabilities in all our business and operation procedures, for both the customer experience and the Team Member experience.

Scope: All CULLITON Team Members.

Definitions: AODA - *Accessibility for Ontarians with Disabilities Act, 2005*
IAS – *Integrated Accessibility Standards, O. Reg. 191/11.*
Team Member – all individuals who perform work on behalf of CULLITON. This includes employees at all levels (technicians, admin staff, supervisors, management, the President & CEO, etc.), volunteers, co-op students, and employees of third-party companies that have been contracted by CULLITON.

Policy:

1.0   Statement of Commitment

1.1   CULLITON believes in the integration put forth by the *Accessibility for Ontarians with Disabilities Act, 2005* and related legislation. We are committed to achieving integration by maintaining compliance, removing and preventing barriers to accessibility, prioritizing meeting the needs of those with disabilities, and treating all people in a way that allows them to maintain their dignity and independence.

1.2   CULLITON's *G-009 Accessibility Program* is a comprehensive set of policies, procedures, and plans that encompass the entirety of the current (2016 version) IAS, under AODA.

1.3   The entirety of *G-009* is readily available to the public through the CULLITON website, and upon request, any portion is available in an accessible format or with communicative support. Any requests related to *G-009* will be treated as a high priority task.

2.0   Establishment of Accessibility Policies

2.1   Currently, CULLITON's Accessibility Program contains five (5) policies; this introductory policy and four (4) policies specific to each applicable Part of the IAS. The polices are:
- *G-009A Accessibility Program*
- *G-009B Information and Communications Standard Policy*
- *G-009C Employment Standard Policy*
- *G-009D Design of Public Spaces Standard Policy*
- *G-009E Customer Service Standard Policy*

2.2 In addition to these policies, CULLITON has created a statement of organizational commitment to meet the accessibility needs of persons with disabilities in a timely manner within each of the *G-009* policies and on the CULLITON website.

3.0 Multi-Year Accessibility Plan

3.1 As a large organization, CULLITON is required to create a multi-year accessibility plan that meets the following requirements:
- The plan must outline the organization's strategy to prevent and remove barriers and meet its requirements under the IAS .
- The plan must be documented and posted to the CULLITON website. Upon request, it should be available in an accessible format.
- The plan must be reviewed and updated at least once every five years.

3.2 The Multi-Year Accessibility Plan will be saved and kept in the *G-009 Accessibility Program* folder, under the file name: *G-009F Multi-Year Accessibility Plan*.

4.0 Team Member Accessibility Training

4.1 CULLITON will ensure that all Team Members have training with respect to the requirements of the IAS and the Ontario Human Rights Code in relation to individuals with disabilities. Proof of completion will be kept on file. Contractors used by CULLITON will be required to provide CULLITON proof of training, upon request.

4.2 Training provided may be different for each position at CULLITON. The training will be appropriate to the duties of each position and will be based on the job descriptions and/or day-to-day practice of each position.

4.3 New hires are given this training immediately and if a Team Member is found to be missing proof of completion, they will be provided the training again immediately.

5.0 Self-Serve Kiosks

5.1 CULLITON does not currently design, procure, or acquire any self-service kiosks (which includes hand-held payment devices).

5.2 If CULLITON decides to implement self-service kiosks in the future, we will consider accessibility needs for persons with disabilities. Specifically, to achieve greater accessibility for individuals with disabilities, the technical features (colour contrast, font size, time features, voice activating equipment, visual and non-visual modes of operation, etc.), structural features (height, stability, headsets, volume control, specialized keyboards, etc.), and access path to the kiosk (reach ranges, proximity, etc.) will be taken into consideration.

5.3 CULLITON will strive to include these accessibility features where possible, and will consider the accessibility needs, preferences, and abilities of a wide range of users.

6.0   **President & CEO Signature**

Tim Culliton

Tim Culliton
President & CEO
December 2023

SOP#: G-009B
Prepared by: Rachel Oda Carteiro   Approved by: Tim Culliton

Title: ***Information and Communications Standard Policy***

Purpose: To comply with the Information and Communications Standard within the ISA that has been set out by the *Accessibility for Ontarians with Disabilities Act, 2005.*

Scope: All CULLITON Team Members.

Definitions: Accessible Formats – refers to alternatives to standard print.
AODA - *Accessibility for Ontarians with Disabilities Act, 2005*
Communication – refers to the interaction between two or more people or entities when Information is provided, sent, or received between the people or entities.
Communication Supports – refers to methods to assist communications.
Information – refers to knowledge, data, and facts that convey meaning and that exist in any format such as text, audio, digital, or images.
Internet Website - a collection of related web pages, images, videos, or other digital assets that are addressed relative to a common Uniform Resource Identifier (URI) and is accessible to the public.
Intranet Website - an organization's internal website that is used to share any part of the organization's information or operational systems privately and securely within the organization.
IAS – *Integrated Accessibility Standards, O. Reg. 191/11.*
Team Member – all individuals who perform work on behalf of CULLITON. This includes employees at all levels (technicians, admin staff, supervisors, management, the President & CEO, etc.), volunteers, co-op students, and employees of third-party companies that have been contracted by CULLITON.

Policy:

1.0   Statement of Intent

1.1   CULLITON will communicate with individuals with disabilities in ways that consider their personal disability. When asked, we will provide information about our organization and its services, including public safety information, in accessible formats or with communication support. We will also continue to meet internationally recognized Web Content Accessibility Guidelines 2.0 Level AA website requirements, in accordance with Ontario's accessibility laws.

2.0   Accessible Formats and Communication Supports

2.1   CULLITON is committed to providing information about its goods and services, and publicly shared policies, procedures, and plans, in accessible formats and/or with communication support,

as needed. General notice of this availability will always be easily locatable on CULLITON's website. All requests will be completed as soon as possible.

2.2 Accessible formats and communication support for individuals with disabilities will be provided, upon request. CULLITON will work with the individual to determine the best accessible format or communication support for them.

- The information will be provided in a timely manner and at a cost that is no more than the regular price charged to others.
- CULLITON will consult with the person making the request when determining the suitability of an accessible format or communication support.

2.3 Accessible formats and communication supports may include one or more of the following:

- Accessible electronic formats such as PDFs
- Braille
- Accessible audio formats
- Large print
- Text transcripts of visual and audio Information
- Reading the written Information aloud to the person directly
- Exchanging handwritten notes or providing a communication assistant
- Captioning or audio description
- Assistive listening systems
- Augmentative and alternative communication methods and strategies, such as letter, word or picture boards, and devices that speak out messages
- Sign language interpretation and intervenor services
- Repeating, clarifying, or restating information

3.0   Emergency Procedure, Plans, or Public Safety Information

3.1 All emergency procedures, plans, or public safety information that CULLITON has made publicly available will be provided in accessible formats or with communicative supports, upon request.

4.0   Feedback

4.1 CULLITON utilizes and maintains a feedback system that can support accessible formatting. Upon request, CULLITON will provide feedback processes in an accessible format or with communication support. CULLITON will discuss with the requester the best alternative format or communication support for them.

4.2 CULLITON's website contains the following message and will be maintained:

"The goal of CULLITON accessibility policies is to meet and surpass customer expectations while integrating accessibility into our core business processes. All comments about the level of service we have provided are welcome and appreciated.

Questions, complaints, or otherwise feedback regarding any of CULLITON's services can be sent by e-mail, verbally, or through a feedback form. Alternative accessible formats and communication supports are available upon request. More information about our feedback process is available in accessible formats upon request.

If the person initiating the feedback wishes to be contacted, CULLITON will respond within ten (10) business days in their preferred format, if indicated."

G-009B Information and Communications
Standard Policy
Department: General & Admin
Effective Date: December 5, 2023
Revision: 00
Page **3** of **3**

5.0 **Accessible Websites and Web Content**

5.1 CULLITON recognizes the importance of website accessibility and currently maintains a company internet website that conforms with the World Wide Web Consortium Web Content Accessibility Guidelines (WCAG) 2.0 Level AA, with exclusion of the success criteria 1.2.3 Captions (Live) and 1.2.5 Audio Descriptions (Prerecorded).

5.2 This level of WCAG 2.0 Level AA compliance is a CULLITON standard for all internet websites, web content, and web-based applications (if within the capabilities of the application).

5.3 Exclusions to this standard are limited to only when it is not practical to achieve the standard, considering only the availability of commercial software or tools. Furthermore, company intranet websites and applications are excluded from this standard, such as the CULLITON SharePoint.

6.0 **Unconvertible Information and Communications**

6.1 If CULLITON determines that information or communication is unconvertible, it will provide the individual requesting the information or communication with:
- An explanation as to why the information or communication is unconvertible; and
- A summary of the unconvertible information or communication.

7.0 **President & CEO Signature**

Tim Culliton

Tim Culliton
President & CEO
December 2023

G-009C Employment Standard Policy

Department:	General & Admin
Effective Date:	December 5, 2023
Revision:	00
	Page **1** of **3**

SOP#: G-009C
Prepared by: Rachel Oda Carteiro   Approved by: Tim Culliton

Title:	***Employment Standard Policy***

Purpose:	To comply with the Employment Standard within the ISA that has been set out by the *Accessibility for Ontarians with Disabilities Act, 2005.*
Scope:	All CULLITON Team Members, excluding volunteers, co-op students, and other non-paid individuals.
Definitions:	AODA - *Accessibility for Ontarians with Disabilities Act, 2005*
Career Development and Advancement – providing additional responsibilities within an employee's current position and the movement of an employee from one job to another in an organization that may be higher in pay, provide greater responsibility or be at a higher level in the organization or any combination of them and, for both additional responsibilities and employee movement, is usually based on merit or seniority, or a combination of them.
IAS – *Integrated Accessibility Standards, O. Reg. 191/11.*
Performance Management – activities related to assessing and improving employee performance, productivity, and effectiveness, with the goal of facilitating employee success.
Redeployment – the reassignment of employees to other departments or jobs within the organization as an alternative to layoff, when a particular job or department has been eliminated by the organization.
Team Member – all individuals who perform work on behalf of CULLITON. This includes employees at all levels (technicians, admin staff, supervisors, management, the President & CEO, etc.,), volunteers, co-op students, and employees of third-party companies that have been contracted by CULLITON.

Policy:

1.0   Statement of Intent

1.1   CULLITON is committed to maintaining an open and fair recruitment and hiring process. To do this, accommodation will be offered at several stages of the recruitment process and after hiring. Furthermore, all Team Members are always welcome to come forward with a request for an individualized accommodation plan. In managing performance and planning career development, CULLITON ensures that those with disabilities are given equal opportunity and appropriate allowances for differences.

2.0   Recruitment and Hiring Process

2.1   Every job posting made by CULLITON will include a statement offering accommodation for applicants with disabilities upon request.

2.2 Every candidate that is chosen for the selection process will be told at each step of the selection process via a written statement that accommodation is available upon request. If a candidate does require accommodation, they will meet with HR before the scheduled date and make arrangements that best suit the candidate's accessibility needs.

2.3 Upon an offer of employment with CULLITON, the selected candidate will be told in writing that an accommodation plan can be requested and accommodation arranged before they begin work. If the candidate is receiving a contract, the written statement will appear there. Furthermore, CULLITON will share a link to their Accessibility information page on the CULLITON website, where the candidate will have access to the full Accessibility Program.

3.0 Team Member Awareness of Accessibility Supports

3.1 Team Members will be made aware of the various accessibility policies and procedures. New Team Members will be introduced to the Accessibility Program during their orientation. Revisions of all documents in the Accessibility Program will be released to Team Members via a changelog email.

4.0 Accessible Formats and Communications Support for Team Members

4.1 Upon request, CULLITON will provide any information that is needed to perform the Team Member's job and information that is generally available in the workplace to a Team Member in an accessible format and/or with communications support, as determined by their accommodation plan. If there is no accommodation plan in place at the time of request, one will be created.

5.0 Individual Accommodation Plans

5.1 CULLITON has developed an independent procedure for creating and maintaining individual accommodation plans that complies with the guidelines set out in the IAS: *G-008 Individual Accommodation Plan Procedure*.

6.0 Workplace Emergency Response Information

6.1 CULLITON will provide an individualized emergency response plan to all Team Members who require one due to a disability. This plan will be included with their individual accommodation plan and more details can be found in *G-008 Individual Accommodation Plan Procedure*.

6.2 If a plan requires the assistance of another Team Member, CULLITON will provide the workplace emergency response plan to the person designated by the disabled Team Member, with consent.

6.3 CULLITON will prioritize making the emergency response plan and deliver it to the Team Member as soon as possible.

CULLITON shall review the individualized workplace emergency response information when:
- The Team Member moves to a different location in the organization.
- The Team Members' overall accommodation needs and/or plans are reviewed.
- CULLITON reviews its general emergency response policies.

7.0   Return to Work Process

7.1   CULLITON will develop and have in place a return-to-work process for its Team Members who have been absent from work due to a disability and require disability-related accommodations to return to work.

7.2   This return-to-work process will be documented, utilize the individual accommodation plan procedure, and will outline the steps that CULLITON will take to facilitate the return of the Team Member.

7.3   This process will not replace or override any other return-to-work process created by or under another statute. CULLITON's workplace injury/illness return-to-work process can be found in the policy *H-022 Return to Work Program*.

8.0   Performance Management

8.1   When performing performance management and performance evaluations of a Team Member with a disability, CULLITON will consider the accessibility needs of the Team Member and/or their accommodation plan.

8.2   This may manifest in a variety of ways, including:
- Using alternate performance measurements
- Conducting meetings or evaluations in an accessible form
- Conducting performance evaluations at different regular intervals

9.0   Career Development and Advancement

When providing career development or advancement for a Team Member with disabilities, their accessibility needs and/or accommodation plan will be considered. Furthermore, if the Team Member's duties or position change, any existing accommodation plan needs to be updated.

10.0   Redeployment

6.1   When redeploying a Team Member with disabilities, their accessibility needs and/or accommodation plan needs to be considered. Furthermore, if redeployment occurs any existing accommodation plan needs to be updated.

11.0   President & CEO Signature

Tim Culliton

Tim Culliton
President & CEO
December 2023

SOP#: G-009D
Prepared by: Rachel Oda Carteiro   Approved by: Tim Culliton

Title: *Design of Public Spaces Standard Policy*

Purpose: To comply with the Design of Public Spaces Standard within the Integrated Standards Act that has been set out by the *Accessibility for Ontarians with Disabilities Act, 2005.*

Scope: All CULLITON Team Members and future construction or major renovations of public spaces.

Definitions: AODA - *Accessibility for Ontarians with Disabilities Act, 2005*
IAS – *Integrated Accessibility Standards, O. Reg. 191/11.*
Public Space – a space that is intended for public use, including the use of CULLITON visitors and guests. Excludes space that is exclusively intended for CULLITON Team Member use.
Team Member – all individuals who perform work on behalf of CULLITON. This includes employees at all levels (technicians, admin staff, supervisors, management, the President & CEO, etc.), volunteers, co-op students, and employees of third-party companies that have been contracted by CULLITON.

Policy:

1.0   Statement of Commitment

1.1   CULLITON is committed to keeping accessibility as a forethought when planning any major renovations or new construction of its public spaces. We will work closely with our contractors to ensure that technical requirements are met, and accessible elements have a practical maintenance plan. CULLITON is committed to keeping customers and guests with disabilities safe and independent when visiting the CULLITON office.

2.0   Exterior Paths of Travel

2.1   For any future new construction or redeveloping of existing public exterior paths of travel that CULLITON intends to maintain, Team Members will follow the technical requirements outlined in O. Reg. 191/11, s.80.23 – 80.31, including requirements for stairs, curbs, slopes, signage, etc.

3.0   Off Street Parking

3.1   The CULLITON visitor parking area, nearest the visitor door, currently maintains a single Type A parking spot with a sign to indicate it is designated accessible.

3.2   If CULLITON were to redevelop (including painting of) its visitor parking area, the single accessible parking spot would be updated with new signage and a clear access aisle, as outlined in O. Reg. 191/11, s.80.34 – 80.35.

3.3   Upon employee request, a new designated accessible parking spot will be created and maintained in any of the employee parking lot facilities.

4.0   Obtaining Services

4.1   If CULLITON were to do major renovations in the lobby reception area or new construction of an area that customers would obtain services in/from, Team Members would ensure to follow physical requirements for service counters, queuing guides, and waiting areas (as applicable), as outlined in the IAS.

5.0   Maintenance

5.1   To ensure that accessible elements added in future renovations or new construction are maintained, procedures for preventative and emergency maintenance will be outlined and updated regularly in CULLITON's multi-year accessibility plan.

5.2   The multi-year plan will also include procedures for dealing with temporary disruptions of the function of accessible elements.

6.0   Other Public Spaces

6.1   If at any time in the future, CULLITON decides to create and maintain the following public spaces, Team Members will follow all IAS guidelines and keep accessibility as an integral part of the planning phase:
- Public trails and beach routes
- Public outdoor eating areas
- Public outdoor play spaces

7.0   President & CEO Signature

Tim Culliton

Tim Culliton
President & CEO
December 2023

G-009E Customer Service Standard Policy

Department:	General & Admin
Effective Date:	December 5, 2023
Revision:	01
	Page **1** of **4**

SOP#: G-009E
Prepared by: Rachel Oda Carteiro   Approved by: Tim Culliton

Title: *Customer Service Standard Policy*

Purpose: To comply with the Customer Service Standard found in the ISA that has been set out by the *Accessibility for Ontarians with Disabilities Act, 2005* and to act as a documented copy of the feedback process, AODA staff training process, and the use of service animals and support persons at CULLITON facilities that can be shared with the public, upon request.

Scope: All CULLITON Team Members.

Definitions: AODA - *Accessibility for Ontarians with Disabilities Act, 2005*
IAS – *Integrated Accessibility Standards, O. Reg. 191/11.*
Team Member – all individuals who perform work on behalf of CULLITON. This includes employees at all levels (technicians, admin staff, supervisors, management, the President & CEO, etc.), volunteers, co-op students, and employees of third-party companies that have been contracted by CULLITON.

Policy:

1.0   Statement of Commitment

1.1   CULLITON is committed to providing an excellent customer service experience to all customers with disabilities. To do this, we ensure that all Team Members have been trained in Ontario's accessibility laws and how to communicate with individuals with various disabilities. Furthermore, CULLITON will ensure that its Office facility is accessible to all customers who wish to visit and customers with disabilities are given an equal opportunity to learn about and benefit from the services that CULLITON offers.

2.0   Customer Communication

2.1   All CULLITON service technicians will communicate with people with disabilities in ways that consider their disability. All documentation will be provided in the preferred accessible format, upon request. It is the responsibility of the technician to ensure that all documentation is communicated completely if a customer's disability prevents them from understanding or accessing standard CULLITON paperwork.

2.2   All CULLITON customer service operators will communicate with people with disabilities in ways that consider their disability. If any customer requests information about any CULLITON paperwork that they have received, it is the responsibility of the customer service operator to communicate all information contained in the paperwork in the individuals preferred accessible format.

2.3   All CULLITON administrative staff will communicate with people with disabilities in ways that consider their disability. If any customer requests information about any CULLITON paperwork

that they have received, it is the responsibility of the CULLITON administrative staff to communicate the information contained in the paperwork in the individuals preferred accessible format.

3.0 AODA Customer Service Training

3.1 In addition to role specific AODA training, as outlined in *G-009A Accessibility Program*, all Team Members will complete training specific to the Customer Service Standard. This training includes:
- How to interact and communicate with individuals with various types of disabilities.
- How to interact with individuals with disabilities who use an assistive device or require the assistance of a guide dog, other service animal, or the assistance of a support person.
- How to use equipment or devices available on the provider's premises or otherwise provided by the provider that may help with the provision of goods, services, or facilities to a person with a disability.
- What to do if an individual with a particular type of disability is having difficulty accessing the provider's goods, services, or facilities.

3.2 New Team Members will be trained upon hire and proof of completion kept. Any contractor hired by CULLITON will require proof of completion by their assigned employees, upon request.

3.3 All Team Members will receive regular annual training about this policy, *G-009E Customer Service Standard Policy*. Additional training will be given if any part of this policy were to change.

3.4 If a member of the public requests information about the AODA-specific customer service training at CULLITON, a copy of **3.0 AODA Customer Service Training**, with the inclusion of role specific AODA training guidelines, will be shared with them in an accessible format, if requested. A notice of this will be posted on the CULLITON website.

4.0 Assistive Devices

4.1 When customers access our services and facilities open to the public, those with disabilities are permitted to use their personal assistive devices. Furthermore, all Team Members will be trained and familiar with various assistive devices that may be used by our customers.

4.2 These devices include but are not limited to:
- Wheelchairs
- Canes
- Walkers
- Personal hearing devices

5.0 Support Persons

5.1 CULLITON will ensure that an individual who is accompanied by a support person will be allowed to have that person accompany them on our CULLITON facilities that are open to the public.

6.0 Service Animals

6.1 CULLITON welcomes people with disabilities and their service animals. Service animals are allowed on/in all areas of CULLITON property that are open to the public.

6.2 All service animals welcomed to CULLITON property should be wearing a visual indicator of their status, such as a harness or a vest. If a Team Member is unable to determine if the animal is a service animal, they may ask the accompanying individual for documentation from a regulated health professional that confirms the status of the animal. Regulated health professionals include a member of one of the following:

- College of Audiologist and Speech-Language Pathologists of Ontario
- College of Chiropractors of Ontario
- College of Nurses Ontario
- College of Occupational Therapists of Ontario
- College of Physicians and Surgeons of Ontario
- College of Physiotherapists of Ontario
- College of Registered Psychotherapist and Registered Mental Health Therapists of Ontario

6.3 If a member of the public requests information about CULLITON policies regarding assistive devices, service animals, and/or support persons, a copy of sections **4.0**, **5.0**, and **6.0** will be shared with them in an accessible format, if requested. A notice of this will be posted on the CULLITON website.

7.0 Temporary Disruption of Services

7.1 In the event of a planned or unexpected disruption to services or facilities for customers with disabilities, CULLITON will notify customers promptly.

7.2 When the temporary disruption of service will create a certain, predictable disruption to a customer with a disability, CULLITON will contact them directly via email or phone, if possible.

7.3 A notice will be made available to the public through a message on the CULLITON phone service and a posted notice on the CULLITON website. Physical notices will also be posted on all affected CULLITON office entrances.

7.4 Notices of temporary disruptions will include information about the reason for the disruption, its anticipated length of time, and a description of alternative facilities or services, if available.

7.5 In addition, CULLITON will prepare a document setting out planned steps that are being taken in connection with the disruption. Upon request, this document will be available to the public. Notice of this will be available on the CULLITON website at the time of the disruption.

8.0 Customer Feedback

8.1 CULLITON welcomes feedback from all customers and is happy to offer accessible formats or communicative supports to customer with disabilities who wish to provide feedback, upon request.

8.2 Standard CULLITON feedback procedures include a customer feedback link on the CULLITON website or calling CULLITON at (519) 271-1981 and select option 1.

8.3 If a customer requests information about the feedback process at CULLITON, a copy of **8.0 Customer Feedback** will be shared with them in an accessible format, if requested. A notice of this will be posted on the CULLITON website.

G-009E Customer Service Standard Policy

Department:	General & Admin
Effective Date:	December 5, 2023
Revision:	01
	Page **4** of **4**

9.0   Maintaining Accessible Facilities

9.1   To maintain the accessibility of public CULLITON spaces, the Joint Health and Safety Committee will include accessible elements of the lobby and parking area in their monthly office inspections.

9.2   Any deficiencies will be corrected by the assigned Team Members and be treated as high priority.

10.0   President & CEO Signature

Tim Culliton

Tim Culliton
President & CEO
December 2023